



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

August 24, 2022

**BY ECF**

Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Robert Hadden, 20 Cr. 468 (RMB)**

Dear Judge Berman:

The Government writes to correct an error contained in its August 1, 2022 memorandum in opposition to the defendant's motions *in limine*. (Dkt. 178). In the Government's motions *in limine* of July 18, 2022, the Government discussed the defendant's sex abuse and assault of a victim ("Victim-15"), including the fact that, during a "postpartum appointment," the defendant "licked Victim-15's vagina," after which Victim-15 sent text messages to two witnesses and filed a police report. (Dkt. 173 at 12-13 (emphasis added); *see also id.* at 36-42). In the Government's opposition memorandum, the Government mistakenly characterized the above appointment as a "prenatal" appointment concerning Victim-15's "unborn child" rather than a "postpartum" appointment. (Dkt. 178 at 31). The Government learned of this error on Monday upon reviewing the defendant's reply memorandum (Dkt. 184 at 9 n.7), and writes now to correct the record.

Respectfully submitted,

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cc: Counsel of Record (by ECF)